

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

KEVIN JOHNSON,

Plaintiff,

v.

VIRGINIA DEPARTMENT OF  
CORRECTIONS, *et al.*,

Defendants.

Civil Case No. 3:24-cv-00080  
The Honorable Henry E. Hudson

**STIPULATION OF DISMISSAL**

IT IS HEREBY STIPULATED AND AGREED, by and between the parties pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, that this action is dismissed with prejudice, and that each party shall bear their own fees and costs. However, the parties have agreed that pursuant to *Kokkonen v. Guardian Life Insurance Co. of America*, 511 U.S. 375 (1994), this Court will explicitly reserve jurisdiction to enforce the terms of the parties' settlement.

Date: December 5, 2024

Respectfully submitted,

KEVIN JOHNSON,

By: /s/ Mark J. Krudys  
Counsel

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**Certificate of Service**

I hereby certify that on this 5th day of December 2024, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send notification of such filing (NEF) to all counsel of record.

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